

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-v-

DARRON MARCELLE, Defendant.

13-cr-00017 (PKC)

**MOTION FOR COMPASSIONATE RELEASE ON BEHALF OF
DARRON MARCELLE**

Preliminary Statement

Darron Marcelle, through the undersigned, respectfully moves the Court pursuant to 18 U.S.C. § 3582(c)(1)(A)(i) to modify his sentence and immediately release him to home confinement and a period of supervised release. Between the impacts of the COVID-19 pandemic and his efforts at rehabilitation, Mr. Marcelle is a strong candidate for a compassionate release.

By now, as the Court well knows, the state of prisons during the pandemic is virtually inhumane. There is no ability for inmates to socially distance in any meaningful way. Everyday items, like the phone booth and computer spaces, are not cleaned in between uses exposing the inmates to greater chances of infection. When lockdowns come due to an outbreak, inmates are kept in their cells up to 23 hours per day. Often times inmates have to choose between contacting family and attorneys or washing clothes as the resources are limited. Prison life is harder in this day and age than it has been as any time in recent memory.

Admittedly, the issues discussed above relate not just to Mr. Marcelle, but to all inmates. However, he has individual circumstances that make him a candidate worthy of the Courts' consideration. First, Mr. Marcelle has worked very hard at rehabilitation. While incarcerated he has used the time wisely to take college courses and has obtained degrees in individual studies and human services. Second, he has a job waiting for him, as a truck driver, that will ensure that he is active and will reduce the risk that he will fall into old routines. Third, Mr. Marcelle suffers from intermittent bouts of high blood pressure, a condition the CDC advises puts him at greater risk of contracting and having difficulty recovering the COVID-19 virus. Finally, Mr. Marcelle's mother, a recovering drug addict is getting older and he would like to be home to take care of her as much as is possible.

As is discussed in detail below, Mr. Marcelle moves this Court to grant him compassionate release and grant him to home confinement (with the ability to work as a truck driver) or supervised release.

Procedural History

On September 6, 2016 the Court sentenced Darron Marcelle to 15 years imprisonment after he entered a guilty plea to one count of conspiracy to violate the federal narcotics laws and one count of possession and discharge of firearms in furtherance of the narcotics conspiracy. This was an extraordinary case before the Honorable Debra Batts. In 2014, the United States Attorney's Office for the Southern District of New York ("USAO"), offered Mr. Marcelle a plea agreement that would have resulted in a statutory mandatory minimum of fifteen years. The lawyer representing him at the time of that plea offer, passed away while Mr. Marcelle was still considering the plea offer. The Court appointed new counsel, who proved to be less attentive than Mr. Marcelle had hoped. As such, after a period of several months Mr. Marcelle wrote to

Judge Batts seeking new counsel. In or about February 2015, the Court appointed the undersigned to represent Mr. Marcelle. Before the undersigned was appointed, however, the USAO filed a prior felony information against Mr. Marcelle pursuant to 21 U.S.C. S 841.

Shortly after the undersigned's representation began the undersigned contacted the USAO to accept the 15-year plea offer. However, the USAO informed counsel that the offer had expired as of the end of 2014 and that it had already filed a prior felony information, which meant the best deal Mr. Marcelle could get came with a 20-year mandatory minimum. Mr. Marcelle initially accepted the 20-year plea offer. Upon further investigation of the issue, however, counsel learned that the USAO had proffered not that the 15-year offer had expired, but that Mr. Marcelle had rejected the offer. Based on the conflicting facts, Mr. Marcelle informed the Court in a February 2016 motion to withdraw his guilty plea that he was unaware that the 15-year offer had an expiration date and that he never rejected or authorized his counsel to reject the 15-year offer. Judge Batts, after hotly contested briefing, ordered the USAO to withdraw the prior felony information and to re-extend Mr. Marcelle the 15-year offer.

The USAO followed the Court's instructions and, thereafter, Mr. Marcelle entered a guilty plea to counts 1 and 2 of the superseding information and the Court sentenced Mr. Marcelle to the minimum 15 years, including time served. Mr. Marcelle was arrested and incarcerated in January 2013, thus he has served 8 years of a 15 year sentence. Assuming a reduction for "good time" Mr. Marcelle has approximately just under five years left to serve.

While incarcerated in FBC Raybrook, Mr. Marcelle sought compassionate release from the warden. It was denied. He appealed that decision; the appeal was likewise denied. This brings Mr. Marcelle before the Court in the instant filing.

Argument

The plain language of § 3582(c) gives the Court the power to adjust a previously sentenced defendant's sentence. "[T]he court . . . may *reduce* the term of imprisonment (and may impose a term of probation or supervised release with or without conditions that does not exceed the unserved portion of the original term of imprisonment), after considering the factors set forth in section 3553(a) to the extent that they are applicable" Thus, the Court has the authority to reduce a sentence for "extraordinary and compelling reasons." The reasons for the Court to consider compassionate release for Mr. Marcelle are plentiful.

First, Mr. Marcelle has made tremendous strides towards rehabilitation. The primary evidence of this is Mr. Marcelle's efforts to educate himself. In 2016, he enrolled at North County Community College and has obtained two degrees. Attached hereto as Exhibit A are a sampling of Mr. Marcelle's transcripts and courses. The first is in individual studies and the second in human service (so he could help his community by becoming a drug counselor upon release). Between the years 2019-20 he has taken over 20 classes and has achieved an overall 3.219 grade point average. Dating back to 2016, Mr. Marcelle has completed over 40 courses in areas such as: Philosophy, Sociology, Psychology, Leadership, Math, and more. In spring 2020, Mr. Marcelle made the President's List for his academic achievement. Exhibit B.

Mr. Marcelle believes that this demonstrates to the Court his sincere desire to leave behind his former life. Previously, Mr. Marcelle did not take his education as seriously as he needed to and as a result, he felt he had few options but to engage in criminal behavior. However, having been separated from his family for more than 8 years, he used the time wisely so that upon his release he will have job opportunities. Importantly, one of the things that Mr. Marcelle wishes to pursue upon his release is being of service to the community. He believes his

past mistakes combined with his efforts to rehabilitate himself make him the ideal candidate to assist others and try to prevent them from making the same poor life choices he made. As such, Mr. Marcelle asks this Court to consider his post-offense rehabilitation and dedication to his education as a reason to grant him compassionate release.

Second, Mr. Marcelle has a job awaiting him upon his release. Mr. Marcelle has a friend, Melvin Johnson¹ of Tied Up Trucking, who has agreed to give Mr. Marcelle a job as a driver upon his release. Exhibit C, Letter of Melvin Johnson (“Darron will definitely be hired upon his release.”). Mr. Johnson writes that his “mission is to help ex felons with another chance at succeeding out here on these streets like I was giving the chance.” *Id.* Having a job lined up for his immediate future is one way in which Mr. Marcelle believes he can occupy his time so that he does not all into old patterns and backslide into criminal conduct.

Working in the trucking industry is step one of a two step plan Mr. Marcelle has in his mind. The second step, as is referenced above, is for him to enter the business of counseling at-risk individuals. Mr. Marcelle’s studies have guided him to a place where he wants to help others avoid the mistakes he, himself, has made. Becoming a counselor to those in the community is his way of making amends for the troubles he caused in the past. For these reasons, Mr. Marcelle requests the Court grant him compassionate release.

Third, Mr. Marcelle is hoping to avoid contracting COVID-19. Although most of the world has the same hope, Mr. Marcelle finds himself in a high-risk category. Medical records supplied by FBC Raybrook demonstrate that over the course of time Mr. Marcelle has developed intermittent high blood pressure. The records demonstrate that numerous times since 2017, Mr. Marcelle has had blood pressure readings of scores higher than 130/80. Attached hereto as

¹ Mr. Johnson is, himself, a rehabilitated felon. He was also charged in the same indictment as Mr. Marcelle. However, since resolving his case he has embraced a law-abiding lifestyle. See Exhibit C.

Exhibit D are certain medical forms that show Mr. Marcelle's high blood pressure over the course of time. According to www.heart.org this places him in the category of Hypertension Stage 1. In the 8 years Mr. Marcelle has been in prison, his blood pressure has gotten worse and the jail/prison where he has lived have prescribed no medication for him.

The CDC has stated that people suffering from untreated hypertension or high blood pressure might be at increased risks related to contracting COVID-19. Being in prison in a normal time is difficult, being incarcerated during this pandemic has been brutal. There can be no doubt but that the Court has heard the stories about lack of testing, 23-hour per day lockdowns, prisoners being given choices between showering or contacting their families and attorneys, no practical way to social distance, no gloves, and more. Mr. Marcelle has endured all of this and more. He seeks compassionate release from this Court because of the additional risk he faces of a severe case of COVID-19 due to his untreated, intermittent high blood pressure. As such, Mr. Marcelle requests that this Court grant his request and allow him to serve the remainder of his sentence at home or on supervised release so that he can avoid any unnecessary risks.

Finally, Mr. Marcelle's mother is getting older and is not in good health. His mother, for many years, was a drug addict. That lifestyle took a toll on her body and immune system. Mr. Marcelle believes that he needs to be home with her to help care for her. Mr. Marcelle's mother has lived a hard life and he worries that she will not survive this pandemic. In addition, Mr. Marcelle suggests to the Court that those who have cared for his mother while he has been in prison have borne the burden long enough. Having rehabilitated himself, he wishes to be of assistance to his mother in a way that he could not have done 8 years ago. And thus, he seeks compassionate release.

Conclusion

Mr. Marcelle believes he is a good candidate for compassionate release because he has, assuming credit for good time, served two thirds of his sentence. He has gone to great lengths to educate himself and shown dedication to the process by seeking two degrees and obtaining greater than a B average. He has a job lined up a plan for the future. Both will help him remain a law abiding citizen and help counsel others away from a life of crime. His health is at greater risk than the average inmate because of his intermittent hypertension. And it is undeniable that conditions all inmates, including Mr. Marcelle, are forced to live under are more adverse than at any time in recent memory. Finally, Mr. Marcelle would like to be able to assist others in caring for his mother as she gets older and pays the physical price for the life she previously lived. For all of these reasons, Mr. Marcelle respectfully requests that this Court, pursuant to 18 U.S.C. § 3582(c)(1)(A)(i), modify Mr. Marcelle's sentence and immediately release him to home confinement and a period of supervised release.

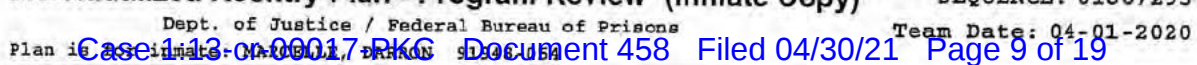
Dated: New York, New York
April 30, 2021

Respectfully submitted,

MORVILLO PLLC

Gregory Morvillo
90 Broad St.
New York, New York 10004
(646) 831-1531
GM@Morvillopllc.com

EXHIBIT A



Proj. Rel. Date: 01-04-2026
Proj. Rel. Mthd: GCT REL
DNA Status: NYM02634 / 01-17-2013

Detaining Agency	Remarks
------------------	---------

1995 Petit Larceny & Criminal Possession of Stolen Property - 5th Degree: No Disposition.

Fac	Assignment	Description	Start
RBK	DINE RM.PM	DINE RM.PM	06-26-2017

FacI	Assignment	Description	Start
RBK	ESL HAS	ENGLISH PROFICIENT	05-02-2013
RBK	GED HAS	COMPLETED GED OR HS DIPLOMA	05-02-2013

SubFac	Action	Description	Start	Stop
RBK		SECOND CHANCE PELL	01-03-2019	CURRENT
RBK		BUSINESS ORG & MAN M-5:30-8:00	02-04-2020	CURRENT
RBK		PER/FAM HEALTH M 12:30-3:30	01-22-2020	CURRENT
RBK		NATIVE AMER CULT T-12:30-3:30	01-23-2020	CURRENT
RBK		HUMAN SERV. DEL. R-5:30-8:00	01-23-2020	CURRENT
RBK		DEVELOPMENTAL PSYCH T-530-800	01-23-2020	CURRENT
RBK	C	INTRO HUMAN SERV TH 12:30-3:30	08-30-2019	01-04-2020
RBK	C	MEANINGS OF LIFE TR12:30-2:30	08-30-2019	01-04-2020
RBK	C	SOC. OF ADDICTIONS T-5:30-8:00	08-30-2019	01-04-2020
RBK	C	INTRO TO PSYCH SAT 12:00-3:00	08-30-2019	01-04-2020
RBK	C	INTRO TO SOCIOLOGY 12:30-3:30	05-14-2019	08-21-2019
RBK	C	LEADERSHIP T-12:30-3:30	05-14-2019	08-21-2019
RBK	C	ELEMENTARY STATS W 7:30-10:30	05-14-2019	08-21-2019
RBK	C	BASIC COUNS SKILLS M-1230-330	05-14-2019	08-21-2019
RBK	C	PSY PER GROWTH T 5:30-8:00	01-11-2019	05-30-2019
RBK	C	ENVIRONMENTAL SCI T 12:30-3:30	01-11-2019	05-30-2019
RBK	C	ENGLISH COMP 1 MW 12:30-2:30	01-11-2019	05-28-2019
RBK	C	INTRO MATH CONCEPTS M-730-1030	01-11-2019	05-28-2019
RBK	C	AVP ADVANCED	02-20-2018	02-22-2018
RBK	W	MAN-UP- GROWTH & PERS. CHANGE	11-16-2017	01-25-2018
RBK	C	AVP BASIC	11-28-2017	11-30-2017
RBK	W	0730 BUSINESS WORD 1	07-25-2017	11-06-2017

Hearing Date	Prohibited Acts
--------------	-----------------

Assignment	Description	Start
CARE1	HEALTHY OR SIMPLE CHRONIC CARE	04-20-2017
CARE1-MH	CARE1-MENTAL HEALTH	01-17-2013

Assignment	Description	Start
NO PAPER	NO PAPER MEDICAL RECORD	01-17-2013



Individualized Reentry Plan - Program Review (Inmate Copy)

Case 1:13-cr-00017-PKC Document 458 Filed 04/30/21 Page 10 of 19

SEQUENCE: 01807293

Dept. of Justice / Federal Bureau of Prisons
Plan is for inmate: MARCELLE, DARRON 91948-054

Team Date: 04-01-2020

Assignment	Description	Start
REG DUTY	NO MEDICAL RESTR--REGULAR DUTY	04-20-2017
YES F/S	CLEARED FOR FOOD SERVICE	02-27-2020

Current Drug Assignments

Assignment	Description	Start
DAP NO INT	DRUG ABUSE PROGRAM NO INTEREST	05-16-2019
ED COMP	DRUG EDUCATION COMPLETE	03-02-2018
NR COMP	NRES DRUG TMT/COMPLETE	01-24-2018

FRP Details

Most Recent Payment Plan

** NO FRP DETAILS **

FRP Assignment: NO OBLG FINANC RESP-NO Start: 04-20-2017

Payments past 6 months: \$0.00 Obligation Balance: \$200.00

Financial Obligations

No.	Type	Amount	Balance	Payable	Status
1	ASSMT	\$200.00	\$200.00	DEFERRED	NEVER PLAN

** NO ADJUSTMENTS MADE IN LAST 6 MONTHS **

Payment Details

Trust Fund Deposits - Past 6 months: \$3,780.00 Payments commensurate ? N/A

New Payment Plan: ** No data **

Progress since last review

He is still enrolled in the Pell Program full time(no details provided).
He is assigned to DINE RM PM and receives "average" work performance ratings.
He currently has a balance of \$5800.00 in his pre release savings account (six months deposits: \$4180/six months withdrawals: \$2060).

Next Program Review Goals

-Continue attending college.
-Receive "good" work performance ratings.
-Continue saving at least \$20-\$30 a month in pre release savings account.

Long Term Goals

-Earn an Associate's Degree by January 2021.
-Have an additional \$120-\$180 saved by October 2020.
-Obtain a Social Security Card and birth certificate at least 17-19 months prior to release.

RRC/HC Placement

No. Management decision - He will be considered 17-19 months prior to release.

Comments

Claims he has paperwork to clear unknown disposition charge. Will provide to case manager later.
Finance/Poverty Need Screen Is there documentation in the PSR of any of the following? _N_ Any history of Bankruptcy _N_ No bank account _Y_ No assets nor liabilities noted in PSR _N_ Debts noted in Credit Report or other sources _N_ Tax Liabilities/back taxes _N_ Unpaid alimony/child support _N_ other indications of lack of financial management skills (specify) _____ YES _X_ NO _____ (if any of the above, check yes)

REGISTER NO: 91948-054

NAME.: MARCELLE

FUNC: PRT

FORMAT.....: TRANSCRIPT

RSP OF: RBK-RAY BROOK FCI

----- EDUCATION INFORMATION -----

FACIL	ASSIGNMENT	DESCRIPTION	START DATE/TIME	STOP DATE/TIME
RBK	ESL HAS	ENGLISH PROFICIENT	05-02-2013 1030	CURRENT
RBK	GED HAS	COMPLETED GED OR HS DIPLOMA	05-02-2013 1030	CURRENT

----- EDUCATION COURSES -----

SUB-FACIL	DESCRIPTION	START DATE	STOP DATE	EVNT	AC	LV	HRS
RBK	SECOND CHANCE PELL	01-03-2019	09-22-2020	P	C	P	1
RBK	INTRO TO NUTRITION	06-30-2020	09-19-2020	P	C	P	39
RBK	PHILOSOPHICAL ISSUES	06-30-2020	09-19-2020	P	C	P	39
RBK	ABNORMAL PYSCHOLOGY TR1230-330	06-30-2020	09-19-2020	P	C	P	39
RBK	SOCIOLOGY OF FAM. R-12:30-3:30	06-30-2020	09-19-2020	P	C	P	39
RBK	BUSINESS ORG & MAN M-5:30-8:00	02-04-2020	06-24-2020	P	C	P	39
RBK	PER/FAM HEALTH M 12:30-3:30	01-22-2020	06-24-2020	P	C	P	39
RBK	NATIVE AMER CULT T-12:30-3:30	01-23-2020	06-24-2020	P	C	P	39
RBK	DEVELOPMENTAL PSYCH T-530-800	01-23-2020	06-24-2020	P	C	P	39
RBK	HUMAN SERV. DEL. R-5:30-8:00	01-23-2020	06-24-2020	P	C	P	39
RBK	INTRO HUMAN SERV TH 12:30-3:30	08-30-2019	01-04-2020	P	C	P	39
RBK	MEANINGS OF LIFE TR12:30-2:30	08-30-2019	01-04-2020	P	C	P	39
RBK	SOC. OF ADDICTIONS T-5:30-8:00	08-30-2019	01-04-2020	P	C	P	39
RBK	INTRO TO PSYCH SAT 12:00-3:00	08-30-2019	01-04-2020	P	C	P	39
RBK	INTRO TO SOCIOLOGY 12:30-3:30	05-14-2019	08-21-2019	P	C	P	39
RBK	LEADERSHIP T-12:30-3:30	05-14-2019	08-21-2019	P	C	P	39
RBK	ELEMENTARY STATS W 7:30-10:30	05-14-2019	08-21-2019	P	C	P	39
RBK	BASIC COUNS SKILLS M-1230-330	05-14-2019	08-21-2019	P	C	F	39
RBK	PSY PER GROWTH T 5:30-8:00	01-11-2019	05-30-2019	P	C	P	39
RBK	ENVIRONMENTAL SCI T 12:30-3:30	01-11-2019	05-30-2019	P	C	P	39
RBK	ENGLISH COMP 1 MW 12:30-2:30	01-11-2019	05-28-2019	P	C	P	39
RBK	INTRO MATH CONCEPTS M-730-1030	01-11-2019	05-28-2019	P	C	P	39
RBK	AVP ADVANCED	02-20-2018	02-22-2018	P	C	P	22
RBK	MAN-UP- GROWTH & PERS. CHANGE	11-16-2017	01-25-2018	P	W	V	0
RBK	AVP BASIC	11-28-2017	11-30-2017	P	C	P	20
RBK	0730 BUSINESS WORD 1	07-25-2017	11-06-2017	P	W	V	22
BRO M	SHU HEALTH	02-12-2017	02-15-2017	P	C	P	3
BRO M	PARENTING PRE-TRIAL EFFECTS	01-30-2017	01-30-2017	P	C	P	2
BRO M	FINANCE PRE-TRIAL	11-28-2016	12-16-2016	P	C	P	12
BRO M	ORIGAMI	05-10-2016	06-07-2016	P	C	P	5
BRO M	CARD MAKING	05-01-2016	05-29-2016	P	C	P	5
BRO M	YOGA/STRESS REDUCTION PRGM	04-06-2016	05-04-2016	P	C	P	10
BRO M	CHESSE LEVEL 2	03-06-2016	04-17-2016	P	C	P	14
BRO M	HEALTH EDUCATION PROGRAM	03-03-2016	03-31-2016	P	C	P	10
BRO M	ANGER MANAGEMENT	12-16-2015	03-07-2016	P	C	P	24
NYM M	ANGER MGT. TRAINING UNIT MGT.	07-01-2015	12-07-2015	P	C	P	8
NYM M	MOTH STORY TELLING	04-04-2015	06-05-2015	P	C	P	6
NYM M	BEGINNING SKETCHING	08-11-2014	09-15-2014	P	C	P	6
NYM M	INDEPEN STUDY GREAT APES	09-15-2014	09-15-2014	P	C	P	1
NYM M	INDEPEN STUDY AFRICAN WILDLIFE	06-01-2013	06-01-2013	P	C	P	1

G0002 MORE PAGES TO FOLLOW . . .

REGISTER NO: 91948-054

NAME..: MARCELLE

FUNC: PRT

FORMAT.....: TRANSCRIPT

RSP OF: RBK-RAY BROOK FCI

----- EDUCATION COURSES -----

SUB-FACL	DESCRIPTION	START DATE	STOP DATE	EVNT	AC	LV	HRS
NYM M	IND STUDY CROCODILE FEAST	05-15-2013	05-15-2013	P	C	P	1

G0000

TRANSACTION SUCCESSFULLY COMPLETED

23 Santaroni Avenue
P.O. Box 89
Saranac Lake NY 12983-0089
518-891-2915
518-891-4236

/1/2020

STUDENT ADVISOR TRANSCRIPT

Page 1 of 1

Student Name : Marcelle, Darron

Student ID : 138065

Provided Solely for:

Marcelle, Darron
28 Ray Brook Road
Ray Brook NY 12977
United States

Major: AAS Individual Studies (SL)

Advisor: _CF-FCI

*** Undergraduate ***

Term: SP-19

Course	Credits	Description	Grade
104	3.00	Environ Science	A
101	3.00	English Comp I	B+
120	3.00	Intro Math Concepts	A
130	3.00	Psych of Personal Growth	B+

Validation: President's List -

0.00 --

	ATT	ERN	HRS	PTS	GPA
TERM:	12.00	12.00	12.00	43.80	3.650
CUM:	12.00	12.00	12.00	43.80	3.650

Term: SU-19

Course	Credits	Description	Grade
201	3.00	Basic Counseling Skills	C+
121	3.00	Elementary Statistics	C
105	3.00	Leadership	A
101	3.00	Introductory Sociology	A

	ATT	ERN	HRS	PTS	GPA
TERM:	12.00	12.00	12.00	36.90	3.075
CUM:	24.00	24.00	24.00	80.70	3.363

Term: FA-19

Course	Credits	Description	Grade
101	3.00	Intro to Human Services	C
140	3.00	Meanings of Life	C
101	3.00	Introductory Psychology	B
107	3.00	Sociology of Addiction	B+

	ATT	ERN	HRS	PTS	GPA
TERM:	12.00	12.00	12.00	30.90	2.575
CUM:	36.00	36.00	36.00	111.60	3.100

Term: SP-20

Academic Standing: Good Academic Standing -

0.00 --

Course	Credits	Description	Grade
100	3.00	Business Organization and Management	A
100	3.00	Personal & Family Health	A-
108	3.00	Native American Culture	B+
200	3.00	Human Services Delivery	A
202	3.00	Developmental Psychology	B-

Validation: President's List -

0.00 --

	ATT	ERN	HRS	PTS	GPA
TERM:	15.00	15.00	15.00	53.10	3.540
CUM:	51.00	51.00	51.00	164.70	3.229

Term: SU-20

Course	Credits	Description	Grade
102	3.00	Intro Nutrition	B
100	3.00	Philosophical Issues	A-
203	3.00	Abnormal Psychology	C
109	3.00	Sociology of Family	A

	ATT	ERN	HRS	PTS	GPA
TERM:	12.00	12.00	12.00	38.10	3.175
CUM:	63.00	63.00	63.00	202.60	3.219

*** End of Undergraduate ***

The Family Educational Rights and Privacy Act of 1974 (as amended) prohibits the release of this information without the student's written consent. An official transcript must include the signature of the registrar and the raised seal of the college. This document reports academic information only.

EXHIBIT B



SARANAC LAKE | MALONE | TICONDEROGA

June 24, 2020

Dear Marcelle, Darron

On behalf of all us at North Country Community College, please accept my heartfelt congratulations on being named to the President's List at North Country Community College for the Spring 2020 semester! It takes much in the way of effort and commitment to one's studies to perform at such a high level and it is gratifying to all of us to witness and celebrate your success.

In addition to receiving this letter, notice of your placement on the President's List will become part of your permanent record.

Best wishes for continued success in the future.

Sincerely,

A handwritten signature in cursive script that reads 'Joe Keegan'.

Joe Keegan
President

JK: lm

Advisor: SCP Team Members

EXHIBIT C

Dear Judge Castel,

My name is Melvin Johnson and I'm writing this letter on the behalf of Darron Marcelle .

I met Darron at around the age of 12yrs old. Me and Darron on numerous occasions talked about life and bettering ourselves and others.

We both came up in a drug infested neighborhood, and we both fell victim to these conditions.

But as we grown into adulthood we've both learned and see there is a different way to live. Every one can change and I definitely hear the growth in my friend since he's been in prison. And I know him so I know it's not just prison talk. Darron has a great spirit as well as a great sense of humor. I know he has worked hard to educate himself and make changes. And I know if I can change my way of thinking in such short time, I know for a fact that he has and will do the same as I have, and be a positive role model to his community.

Since being home I've been driving tractor trailers for about 20 months now. I received my CDL in aug 2019 and haven't looked back yet, I've recently started my own company in trucking last year of aug 2020. My mission is to help ex felons with another chance at succeeding out here on these streets like I was giving the chance. So on my spare time I train and teach guys how to go about getting their license and I've also hired a few guys for dispatch work as well as drivers. If given the opportunity Darron will definitely be hired upon his release. Mainly because I know who he is. A hard worker, and dedicated to what he believes in.

Sincerely,

Melvin Johnson

EXHIBIT D

[REDACTED]